

Ciresi Conlin LLP

VIA EMAIL

April 2, 2020

The Honorable David T. Schultz
United States District Court
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Minneapolis, MN 55415
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Re: *Target Corporation v. Braiform Enterprises, Inc.*
Case No. 19-cv-2179-MJD-DTS

Dear Magistrate Judge Schultz,

On behalf of our client, Defendant and Counterclaim-Plaintiff Braiform Enterprises, Inc. (“Braiform”), we write to inform you that due to actions taken by Plaintiff and Counterclaim-Defendant Target Corporation coupled with recent events, Braiform intends to file for bankruptcy shortly in the United States (as well as jurisdictions across the globe). Given that an automatic stay will be entered once Braiform files for bankruptcy, Braiform respectfully requests a 60 day stay of all deadlines in the case during which time it intends to file for bankruptcy. Braiform will inform the Court immediately upon filing for bankruptcy.

We are happy to discuss further should the Court have any questions.

Sincerely,

/s/Barry M. Landy

Barry M. Landy

BML/ljw

cc: Anne M. Lockner, Esq.
Geoffrey H. Kozen, Esq.